

1 STEPHANIE M. HINDS (CABN 154284)
2 Acting United States Attorney

3 HALLIE HOFFMAN (CABN 210020)
4 Chief, Criminal Division

5 SCOTT SIMEON (NYBN 5012653)
MOHIT GOURISARIA (CABN 320754)
Assistant United States Attorneys

6 150 Almaden Boulevard, Suite 900
7 San Jose, California 95113
Telephone: (408) 535-5061
8 FAX: (408) 535-5066
scott.simeon@usdoj.gov

9 Attorneys for United States of America

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN JOSE DIVISION

13 UNITED STATES OF AMERICA,) CASE NO. 19-CR-00382 EJD
14 Plaintiff,)
15 v.) **UNITED STATES' AMENDED WITNESS LIST**
16 JUAN ROCHA,) Final PTC Date: March 8, 2021
a/k/a Pablo Anthony Nunez,) PTC Time: 9:00 a.m.
17) Courtroom: Courtroom 4, 5th Floor
18 Defendant.)

19
20 The government hereby submits a list of witnesses it may call in its case-in-chief at trial.

21 DATED: March 5, 2021

22 Respectfully submitted,
23
24 STEPHANIE M. HINDS
25 Acting United States Attorney
26
27
28

/s/
SCOTT SIMEON
MOHIT GOURISARIA
Assistant United States Attorneys

| Witness | Subject of Testimony |
|--|---|
| Armando Baltazar Santa Cruz Probation Officer | Supervision of the defendant |
| Suzanne Edson-Homer | Employer/employee relationship with the defendant, including the defendant's statements about his family |
| Taylor Frechette Diplomatic Security Agent | Investigation of and collection of evidence against the defendant |
| Genalle Gilmore Santa Cruz Probation Officer | Supervision of the defendant, including his statements and flight after being contacted by Diplomatic Security agents |
| Lisa Lee Santa Cruz Sheriff's Deputy | 2004 investigation of the defendant for Providing False Identification to a Police Officer, including the defendant's statements |
| Joshua McKim Santa Cruz Sheriff's Deputy | 2019 traffic stop of the defendant, including the defendant's statements and his possession of a check belonging to Jose Rocha |
| Dolores Mestaz | Familial relationship with the true Paul "Pablo" Nunez, and lack of any relationship with the defendant |
| Sally Mestaz | Familial relationship with the true Paul "Pablo" Nunez, and lack of any relationship with the defendant |
| Lauren Nell Diplomatic Security Agent | Investigation of and collection of evidence against the defendant, including the defendant's statements |
| Jose Pilar Nunez | Familial relationship with the true Paul "Pablo" Nunez, and lack of any relationship with the defendant |
| Paul "Pablo" Anthony Nunez | The true Paul "Pablo" Nunez, and his lack of any relationship with the defendant |
| Sara Parham State Department Fraud Prevention Manager | Explanation of the defendant's U.S. State Department records, including application instructions, applications submitted by the defendant, and fraud prevention |

| | | |
|----|--|--|
| 1 | Zenon Rocha | Familial relationship to the defendant and the defendant's true identity |
| 2 | Jose Rocha | Familial relationship to the defendant and the defendant's true identity |
| 3 | Jesus Rocha | Familial relationship to the defendant and the defendant's true identity |
| 4 | Ethan Rumrill Santa Cruz Sheriff's Deputy | 2017 investigation of the defendant for Providing False Identification to a Police Officer, including the defendant's statements |
| 5 | Alma Serrato-Sanchez | Familial relationship to the defendant and the defendant's true identity |
| 6 | Edward Simpson Diplomatic Security Agent | Investigation of and collection of evidence against the defendant, including the defendant's statements and flight |
| 7 | Stephen Sims Diplomatic Security Agent | Investigation of and collection of evidence against the defendant, including the defendant's statements and flight |
| 8 | | |
| 9 | | |
| 10 | | |
| 11 | | |
| 12 | | |
| 13 | | |
| 14 | | |
| 15 | | |
| 16 | | |
| 17 | | |
| 18 | | |
| 19 | | |
| 20 | | |
| 21 | | |
| 22 | | |
| 23 | | |
| 24 | | |
| 25 | | |
| 26 | | |
| 27 | | |
| 28 | | |